

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 04-10164-DPW
)	
SHON ROWELL)	

ASSENTED-TO MOTION TO
CONTINUE FINAL STATUS CONFERENCE

Defendant and the government jointly move that this Court continue the Final Status Conference, presently scheduled for March 15, 2005, to March 29, 2005 at 2:30 p.m. or as soon thereafter as is convenient to the Court. The parties also request that the Court reset the deadlines for dispositive motions and replies. As reasons therefore, the parties state the following:

1. This Court established a final status conference for March 15, 2005 and set a deadlines for the filing of dispositive motions and answers thereto.
2. Counsel for defendant has completed the factual investigation necessary to file a motion to suppress and has drafted a motion for filing. Counsel must meet with defendant, however, before filing the motion. Counsel's attention to this matter has been distracted, because of unanticipated increase in case assignments in the Federal Defender Office as a result of work assigned from attorneys on leave and preparing for leave, trial preparation for an

extortion case scheduled before Judge Lindsay, and two briefs filed in the First Circuit Court of Appeals within the last two weeks.

4. Defendant is therefore requesting an additional two weeks to file a motion to suppress.
5. Defendant requests that the Court set March 29, 2005 as the date by which defendant must file dispositive motions and set April 12, 2005 as the date by which the government should reply.
7. The parties agree that the period commencing March 15, 2005 up to and including the rescheduled Final Status Conference is excludable from calculations under the Speedy Trial Act to allow the filing of dispositive motions.

Assented to:

MICHAEL SULLIVAN
UNITED STATES ATTORNEY

Respectfully submitted,

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By His Attorney,

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